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ENERGY FACILITY SITE EVALUATION COUNCIL

MAY 1 1 2000

OFFICIAL OPPOSITION OF BRITISH COLUMBIA

May 2, 2000

BY FAX: (360) 956-2158 ORIGINAL BY MAIL

Mr. Allen Fiksdal, Manager Energy Facility Site Evaluation Council Box 43172 Olympia, WA 98504-3172

Dear Mr. Fiksdal:

Re: Sumas Energy II Inc. Inc. Proposal For:

- Construction of a gas fired electrical power plant close to Canada U.S. border in Sumas, Washington – impacts on air quality
- 2. 230 kV international power line through Abbotsford and concerns of Abbotsford residents/business people
- 3. Waste water receiving and treatment through JAMES Sewage Treatment Facility environmental impacts and economics
- Drawdown of groundwater on both sides of Canada U.S. border by Sumas Energy II Inc.

I am writing on behalf of many constituents who are affected by this proposal, including all four aspects listed above. This project is the subject of virtually universal opposition in our community.

My constituency assistant attended the March 29, 2000 open house at Abbotsford City Hall. I have read the material offered at that meeting including the executive summary of the final Environmental Assessment Report on the 230 kV power line. I have reviewed a number of documents from Sumas Energy II Inc. and the City of Abbotsford as well as talked to a large number of residents. I have also met with representatives of Sumas Energy II Inc., BC Hydro and the BC Ministry of Environment and continue to do so.

Some of the relevant background facts are:

- 1. This is a private business proposal by a U.S. based company to produce electrical power in the U.S. for sale to U.S. customers (Sumas Energy II Inc. documents).
- 2. BC Hydro will not be buying any of this power and states that it has enough committed resources today to meet expected demand until at least 2007 (Wayne Cousins, BC Hydro).

3. Sumas Energy II Inc. is intending to sell its power to customers in south-western states such as California and Arizona. Abbotsford happens to be a convenient and economical hook-up into the transmission grid.

1. Air Quality:

Air quality in the Lower Fraser Valley air basin into which this plant will emit its discharges is already stressed to the limit. The Canadian Council of Ministers of Environment have identified the Lower Fraser Valley as one of three areas in Canada where summer ground level peak ozone concentrations can exceed the Canadian maximum acceptable level. A reduction in visibility due to air pollution is also a major issue for residents of the Abbotsford/Chilliwack area. The incidence of respiratory problems in the Lower Fraser Valley due to air quality problems is a reality and is increasing. The provincial government as far back as 1991 felt the air quality problem in the Lower Mainland was serious enough to warrant the requirement of the Air Care program for all automobiles. Until recently, the BC Lower Mainland was the only area in Canada to face auto emission regulation.

In considering the overall picture on this issue, I question whether collectively we should consider *any* such facility in this air shed on either side of the Canada – U.S. border. We should not consider incremental air pollution from sources such as Sumas Energy II Inc. for which there are clear alternatives. There are many other locations in less populated areas with no air quality concerns where a new power plant could be built.

Air quality is without question the single biggest concern about this proposal.

2. International Power Line:

- a. The proponent claims that there are no negative human health impacts from a 230 kV line. A representative of Sumas Energy II Inc. stated to me that scientists have been studying the effect of electro-magnetic fields for years regarding allegations of cancer in humans. He said that recent studies have concluded that there are no cause and effect relationships between power lines and cancer in humans.
 - I contrast this with the information I have received from a constituent who is retired and who spent a big part of his life building electrical transmission lines including 230 kV lines. He said that "there have been so many tests done, but they were never conclusive." He further stated that "the (electro-magnetic) field that is generated varies with the ground conditions there are no givens." In his view the residents have every right to question the high voltage power line since no study has unequivocally ruled out negative health impacts on humans.
- b. I question whether the scope of the Canadian National Energy Board (NEB) is adequate to meet the concerns expressed by my constituents. It invites comment generally but appears to be mainly focused on two specific issues:

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	 The effect of the power line on provinces other than those through which the line is to pass. 	
	The impact of the construction and operation of the power line on the environment.	4
	There is nothing in NEB's mandate requiring it to review health implications of a power line. This is a serious and unacceptable deficiency.	
	c. Residents are rightfully very concerned and fearful regarding:	
	1. Impacts on their health from the 230 kV power line	5
	2. Impacts on property values	6
	3. Buzzing and humming noises from the lines	7
	4. Effects on radio reception and radio controls	8
3.	Waste Water Discharge and Treatment through the JAMES Treatment Facility:	
	Sumas Energy II Inc. documents contemplate an agreement with the City of Abbotsford to discharge up to 369,000 gallons of cooling water per day into the JAMES Treatment Plant and then into the Fraser River in British Columbia.	
	It was one thing for the City of Abbotsford to assist a neighbouring town (Sumas) to deal with their existing sewage and waste water disposal issues about five years ago. It is quite a different matter for the City of Abbotsford to enter into various arrangements that would help facilitate a power plant that no one in B.C. wants and many people in Sumas do not want. It is clear that taxpayers in the City of Abbotsford are willing to forego any supposed financial benefit from such an arrangement.	9
	Secondly, as the BC Liberal Party Fisheries Critic, I want to register concerns about potential temperature or pollution impacts on the Fraser River from the discharge of cooling water from Sumas Energy II Inc.	10
	Senior government (Federal and Provincial) have made serious regulatory demands on B.C. residents, businesses and local governments for the protection of fish and fish habitat. I am concerned that accepting large volumes of additional wastewater from outside the province may increase risk to fish and fish habitat.	11
	There are two issues that need to be addressed:	
	a. The possibility of elevated temperatures of the discharge water.	

b. I understand that the discharge water is high is salt content (brine water) and will contain a concentration of whatever components are contained in the water at source.

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4. Drawdown of Groundwater:

It is clear from various reports including Sumas Energy II Inc.'s own documents that the amount of groundwater drawn by the plant will be significant. Even if this water is drawn exclusively on the U.S. side of the international border, the potential impact on Canadian water users is significant. Despite assurances from the proponents, I am unable to accept that the potential impact of Sumas Energy II Inc. on Canadian groundwater supplies is inconsequential so I am asking you to review this concern.

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In summary, I see no B.C. or Canadian interests being served by this proposal. On the contrary, the residents of Abbotsford feel they will be faced with possible increased health risk, noise, increases in air pollution, possible fish habitat damage and drawdown of their groundwater sources.

I urge you to take a position in support of the many residents and business people who are very concerned and opposed to this power plant being built. Clearly there are many more suitable alternative locations to build such a plant. Sumas Energy II Inc. should be directed to consider options outside the highly populated Lower Mainland (B.C./Washington) air shed.

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I appreciate this opportunity to make our views known. I also want to thank you for your. extension of the deadline for submissions to your office.

Yours sincerely,

John van Dongen, MLA

Abbotsford

c.c. Concerned Citizens

Mayor George Ferguson, City of Abbotsford
Bob Bos, Abbotsford Downtown Business Association
Douglas MacAdams, President Abbotsford Chamber of Commerce
Mike de Jong, MLA Matsqui
Barry Penner, MLA Chilliwack
Bruce Thompson, Senior Vice-President, Sumas Energy II Inc.
Honourable Joan Sawicki, Minister of Environment, Lands and Parks
Honourable Dan Miller, Minister of Energy and Mines
Michael Mantha, National Energy Board

Governor Gary Locke, State of Washington

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